Case: 3:23-cr-00570-JJH Doc #: 34 Filed: 03/28/25 1 of 3. PageID #: 207

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IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF OHIO WESTERN DIVISION

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UNITED STATES OF AMERICA,) <u>SUPERCEDING</u>) INFORMATION
Plaintiff,) JUDGE JEFFREY J. HELMICK
v.) CASE NO. <u>23-CR-00570</u>) Title 18, United States Code,
ZION MITCHELL,) Sections 922(a)(6) and 932(b)(2)
Defendant.)

COUNT 1

(False Statement During Purchase of Firearms, 18 U.S.C. § 922(a)(6))

The Acting United States Attorney charges:

1. From on or about May 14, 2021, through on or about August 2, 2023, in the Northern District of Ohio, Western Division, Defendant ZION MITCHELL, in connection with the acquisition of firearms, to wit:

Date	Location	Firearm	Serial Number
May 25, 2021	XXXXX Crossroads Pkwy., Rossford, Ohio	Smith & Wesson .40 caliber pistol	НАН0798
July 8, 2021	XXXXX Crossroads Pkwy., Rossford, Ohio	Taurus 9mm pistol	ACD761557
September 21, 2021	XXXXX Crossroads Pkwy., Rossford, Ohio	Glock 48 9mm pistol	BTYG641
January 10, 2022	XXXXX Crossroads Pkwy., Rossford, Ohio	Taurus .40 caliber pistol	ACK409847
March 4, 2022	XXXXX Crossroads Pkwy., Rossford, Ohio	Springfield Armory XDS-9 9mm Pistol	BA590578
March 11, 2022	XXXXX Crossroads Pkwy., Rossford, Ohio	Glock 19 9mm pistol	BVCB279
May 21, 2022	XXXXX Crossroads Pkwy., Rossford, Ohio	SDS Zigana PX-9 9mm pistol	T0620Z1BM07260
July 24, 2022	XXXXX Crossroads Pkwy., Rossford, Ohio	Taurus 9mm pistol	ADD284503

August 3, 2022	XXXXX Crossroads Pkwy., Rossford, Ohio	Masterpiece Arms Defender 9mm Pistol	FX33225
October 20, 2022	XXXXX Crossroads Pkwy., Rossford, Ohio	Glock 31 .357 cal Pistol	BXUY247
October 30, 2022	XXXXX Crossroads Pkwy., Rossford, Ohio	American Tactical Omni 5.56 cal Pistol	NS367169
October 30, 2022	XXXXX Crossroads Pkwy., Rossford, Ohio	Glock 23 .40 cal. Pistol	BUCV692
January 24, 2023	XXXXX Crossroads Pkwy., Rossford, Ohio	Glock 29 10mm Pistol	BYAL177
February 17, 2023	XXXXX Crossroads Pkwy., Rossford, Ohio	Glock .40 caliber pistol	BXZZ015
July 30, 2023	XXXXX Crossroads Pkwy., Rossford, Ohio	Glock 22 .40 Cal Pistol	BVVA228
August 2, 2023	XXXX Woodville Rd., Oregon, Ohio	Ruger 57 5.7 cal. Pistol	693-98673

from a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false or fictitious oral or written statement, which statement was intended and likely to deceive the licensed dealer of firearms as to a fact material to the lawfulness of such sale of the said firearms to Defendant under Chapter 44 of Title 18 in that Defendant represented a false residential address, and that he was the actual transferee or buyer of the firearms, in violation of Title 18, United States Code, Section 922(a)(6).

COUNT 2 (Straw Purchasing of Firearms, 18 U.S.C. § 932(b)(2))

The Acting United States Attorney further charges:

2. From on or about July 24, 2022, through on or about August 2, 2023, in the Northern District of Ohio, Western Division, Defendant ZION MITCHELL, did knowingly purchase firearms, to wit:

Date	Location	Firearm	Serial Number
July 24, 2022	XXXXX Crossroads Pkwy., Rossford, Ohio	Taurus 9mm pistol	ADD284503
August 3, 2022	XXXXX Crossroads Pkwy., Rossford, Ohio	Masterpiece Arms Defender 9mm pistol	FX33225

October 20, 2022	XXXXX Crossroads Pkwy., Rossford, Ohio	Glock 31 .357 cal. pistol	BXUY247
October 30, 2022	XXXXX Crossroads Pkwy., Rossford, Ohio	American Tactical Omni 5.56 cal pistol	NS367169
October 30, 2022	XXXXX Crossroads Pkwy., Rossford, Ohio	Glock 23 .40 cal. pistol	BUCV692
January 24, 2023	XXXXX Crossroads Pkwy., Rossford, Ohio	Glock 29 10mm pistol	BYAL177
February 17, 2023	XXXXX Crossroads Pkwy., Rossford, Ohio	Glock .40 caliber pistol	BXZZ015
July 30, 2023	XXXXX Crossroads Pkwy., Rossford, Ohio	Glock 22 .40 Cal pistol	BVVA228
August 2, 2023	XXXX Woodville Rd., Oregon, Ohio	Ruger 57 5.7 cal. pistol	693-98673

in or otherwise affecting interstate or foreign commerce, on behalf of, or at the request or demand of unknown individuals, knowing or having reasonable cause to believe that the unknown individuals intended to use, carry, possess, or sell or otherwise dispose of the firearm in furtherance of a felony or a drug trafficking crime, in violation of Title 18, United States Code, Section 932.

CAROL M. SKUTNIK Acting United States Attorney

By:

AVA R. DUSTIN Toledo Branch Chief